

# Sage Legal LLC

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April 21, 2025

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Hector Gonzalez, U.S.D.J.  
225 Cadman Plaza East  
Courtroom 6A South  
Brooklyn, NY 11201-1804

**Re:     Uribe v. Elahi LLC, *et ano.***  
**Case No.: 1:24-cv-7182 (HG) (CLP)**

Dear Judge Gonzalez:

This firm represents the Defendants in this case, who respectfully submit this letter jointly with Plaintiff consistent with this Court's scheduling Order dated April 14, 2025. See ECF Docket Entry [13](#).

With respect to ¶ 1 of the Mandatory Requirements for Case Management Plan ("Requirements"), Plaintiff's counsel notified your undersigned in writing concerning this Order.

As to ¶¶ 2 and 3 of the Requirements, a completed proposed Case Management Plan is enclosed herewith together with Plaintiff's damages calculation.

Concerning ¶ 4 of the Requirements, the parties provide the following description of the case, including the factual, jurisdictional, and legal bases for the claim(s) and defense(s), as well as any contemplated motions, as follows:

**Plaintiff**

This is an FLSA/NYLL matter raising allegations regarding unpaid minimum wages, overtime wages, spread of hours payments, inter alia, and related notice violations. This case arises under the original jurisdiction of the Court based on the F.L.S.A. and supplemental jurisdiction is conferred on to the state law claims because they arise from the same set of facts and transactions as the FLSA claims.

**Defendants**

While Defendants' investigation into Plaintiff's claims is ongoing, Defendants intend to invoke numerous partial and complete defenses, both legal and factual, including but not limited to: (i) Plaintiff did not work the number of hours she claimed; (ii) not all Defendants employed Plaintiff; (iii) the parties did not agree to the rates specified in the complaint; and (iv) the complaint fails to state a claim upon which relief can be granted.

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Defendants anticipate moving to dismiss for failure to state a claim and moving for summary judgment. With respect to the former motion, Plaintiff intends to amend in response to that motion.

Settlement Mechanisms

The parties are prepared to proceed to court-annexed mediation and, failing same, would be amenable to conducting a settlement conference before the Hon. Cheryl M. Pollak, U.S.M.J.

The parties thank this honorable Court for its time and attention to this case.

Dated: Jamaica, New York

April 21, 2025

Respectfully submitted,

**SAGE LEGAL LLC**

/s/ Emanuel Kataev, Esq.

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Enclosures.

**VIA ECF**

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Sandra Uribe*